

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

HAYWARD INDUSTRIES, INC.,

Plaintiff,

v.

BLUEWORKS CORPORATION,  
BLUEWORKS INNOVATION  
CORPORATION, NINGBO C.F.  
ELECTRONIC TECH CO., LTD; NINGBO  
YISHANG IMPORT AND EXPORT CO.,  
LTD.

Defendants.

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NINGBO C.F. ELECTRONIC TECH CO.,  
LTD,

Counterclaim-  
Plaintiffs,

v.

HAYWARD INDUSTRIES, INC.,

Counterclaim-  
Defendant

Civil Action No. 3:20-CV-710 -MOC-DSC

**MOTION TO WITHDRAW**

Pursuant to Local Civil Rule 83.1(f), J. Douglas Grimes of the firm of Allen, Chesson & Grimes and Michael R. Houston, Jami A. Gekas, and Matthew D. Witsman of the firm of Foley & Lardner move this Court for an Order allowing their withdrawal as counsel for Defendants Blueworks Corporation and Blueworks Innovation Corporation in this action and, in support thereof, state as follows:

1. Shaobin Zhu, Carla B. Oakley, Jenna Stokes, and Scott D. Sherwin of the firm of Morgan, Lewis & Bockius and Brooks F. Jaffa of the firm of Cranford, Buckley, Schultze, Tomchin, Allen & Buie have appeared for all Defendants in this action and will remain as counsel for all Defendants, including Blueworks Corporation and Blueworks Innovation Corporation.

2. Blueworks Corporation and Blueworks Innovation Corporation have consented to the withdrawal of J. Douglas Grimes, and Michael R. Houston, Jami A. Gekas, and Matthew D. Witsman and their respective law firms.

WHEREFORE, J. Douglas Grimes, and Michael R. Houston, Jami A. Gekas, and Matthew D. Witsman respectfully request that the Court enter an Order allowing them to withdraw as counsel of record for Defendants Blueworks Corporation and Blueworks Innovation Corporation.

[SIGNATURE ON NEXT PAGE]

This the 21<sup>st</sup> day of June, 2022.

*s/ Doug Grimes*

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J. Douglas Grimes  
**Allen, Chesson & Grimes PLLC**  
505 N. Church Street  
Charlotte, North Carolina 28202  
(704) 755-6012  
[dgrimes@allenchesson.com](mailto:dgrimes@allenchesson.com)

Michael R. Houston  
Jami A. Gekas  
Matthew D. Witsman  
**Foley & Lardner, LLP**  
321 N. Clark St., Suite 3000  
Chicago, Illinois 60654  
Tel: (312) 832-4500  
[mhouston@foley.com](mailto:mhouston@foley.com)  
[jgekas@foley.com](mailto:jgekas@foley.com)  
[mwitsman@foley.com](mailto:mwitsman@foley.com)  
***Attorneys for Defendant Blueworks Corporation and  
Blueworks Innovation Corporation***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing MOTION TO WITHDRAW was served on all counsel of record electronically, via the CM/ECF system.

This the 21<sup>st</sup> day of June, 2022.

/s/ Doug Grimes